Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: WT Docket 94-102

I firmly support APCO International's position that wireless 9-1-1 accuracy testing should be required at the local community level and if possible at the neighborhood level.

I also firmly support APCO International's recommendation that compliance testing be conducted at the PSAP, county or statistical area (MSA or RSA) level, not at the state or national level as some carriers suggest. It is also important to require re-testing on a periodic basis, no less frequently than every two years and even more frequently if possible.

An vivid example of the lack of accuracy in a current wireless 9-1-1 system was on the overnight TV news (Washington DC) last night (3/2/2005-3/3/2005) where a couple, who were trapped in the snow, were calling 911 on a cell phone for help for hours.

I can identify with the 911 call taker and responding search units and the frustration they felt for hours trying to identify the location in the snow were this couple was trapped. My professional experience spans almost 40 years overlapping in Information Systems Technology, Public Management, Public Safety and Electronics Technology with more then twenty years of experience (1982 - 2004) in Information Systems Technology and more then twenty-three years of experience (1967 - 1991) in Public Safety. Seven years as a Military Police Desk Sergeant/Patrol Supervisor (95B40) in US Army, (1967 - 1974.) and more then sixteen years with the City of New York Police Department as a Supervisory Police Communications Technician (1974 -1982), and as a Computer Specialist (Software), Project Manager (1982 - 1991). Back in the days when 911 systems blossomed and the prime goal of 911 systems was to save a life, not save a dime.

In those days, before the wide use of caller id, 911 centers were forced to resort to the time consuming and costly practice of having a Bell System Technician back-trace a call on land-line, frame by frame. Once in awhile, we did save a life. However, back then, given the resources available, it was almost impossible to identify a reasonable search area, let alone a location of a wireless caller to 911.

Today, I have since retired with over 20 years of Federal service and have enrolled at The George Washington University's School of Engineering and Applied Science in the Engineering Management and Systems Engineering (EMSE) Department / Institute for Crisis, Disaster, and Risk Management (ICDR) pursing a professional degree of Applied Scientist in Engineering Management (Crisis, Emergency, and Risk Management / Information Systems).

I know we have the technology (Global Positioning System (GPS), Geographic Information Systems (GIS), Enhanced 911, GPS enabled cell phones and other tools), the knowledge and the resources to accurately and quickly render aid and save more lives.

Thank you

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